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Attorneys for Defendants
TOYOTA MOTOR NORTH AMERICA INC.;
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA; and
TOYOTA MOTOR SALES, U.S.A., INC.

[Additional Counsel for the Parties Listed on Signature
Page]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOHN WADE,

Plaintiff,

vs.

TOYOTA MOTOR NORTH AMERICA INC.;
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA;
and TOYOTA MOTOR SALES, U.S.A., INC.,

Defendants.

Case No. 2:25-cv-01071-TLN-CKD

**JOINT STIPULATION TO EXTEND
DEFENDANTS' DEADLINE TO
RESPOND TO COMPLAINT; ORDER**

Chief Judge: Hon. Troy L. Nunley

Complaint Filed: April 10, 2025

Pursuant to E.D. Cal. L.R. 143 and 144, Plaintiff John Wade and Defendants Toyota Motor North America Inc., Toyota Motor Engineering & Manufacturing North America and Toyota Motor Sales, U.S.A., Inc. (“Defendants”) (collectively, the “Parties”), by and through their undersigned counsel, stipulate and agree as follows:

WHEREAS, on April 10, 2025, Plaintiff’s counsel in this case filed a complaint (“Complaint”) against Defendants in the United States District Court for the Eastern District of California, captioned *John Wade, et al., v. Toyota Motor North America Inc., et. al.*, No. 2:25-cv-01071-TLN-CKD (the “Action”);

WHEREAS, on April 14, 2025, Plaintiff served the Summons and Complaint on each of the Defendants;

WHEREAS, as of April 28, 2025, Defendants retained counsel to represent them in this Action;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the deadline for Defendants to respond to the Complaint currently is May 5, 2025;

WHEREAS, counsel for the Parties have met and conferred regarding Defendants’ deadline to respond to the Complaint and agreed to seek the Court’s approval that Defendants may have up to and including July 3, 2025, to respond to the Complaint to allow Defendants sufficient time to evaluate and respond to the ten counts; and

WHEREAS, no previous extensions of Defendants’ time to respond to the Complaint have been requested in the Action.

IT IS HEREBY STIPULATED by and between the Parties that Defendants’ responses to the Complaint shall be filed on or before July 3, 2025.

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1 Dated: April 30, 2025

MORGAN, LEWIS & BOCKIUS LLP
David L. Schrader
Lisa R. Weddle

4 By /s/ Lisa R. Weddle
Lisa R. Weddle

6 Attorneys for Defendants
TOYOTA MOTOR NORTH AMERICA
7 INC.; TOYOTA MOTOR
ENGINEERING &
8 MANUFACTURING NORTH
AMERICA; and TOYOTA MOTOR
9 SALES, U.S.A., INC.

10 Dated: April 30, 2025

KELLER ROHRBACK L.L.P.
Ryan McDevitt (*pro hac vice*)
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13 Benjamin E. Johns (*pro hac vice*)
14 Samantha E. Holbrook (*pro hac vice*)

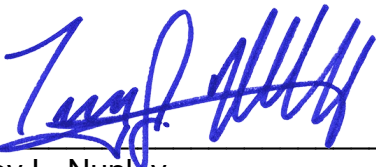
15 WITTELS MCINTURFF PALIKOVIC
Ethan D. Roman (*pro hac vice*)

17 By /s/ Ryan McDevitt
Ryan McDevitt

19 Attorneys for Plaintiff
JOHN WADE

22 In accordance with the foregoing stipulation **IT IS SO ORDERED.**

24 Dated: April 30, 2025

25 
26 Troy L. Nunley
27 Chief United States District Judge
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